

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF PLAINTIFF
NETLIST INC.'S ADDITIONAL MOTIONS *IN LIMINE*
(SAMSUNG CASE NO. 2:22-CV-293)**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Plaintiff Netlist, Inc.’s Additional Motions *in Limine* (Samsung Case No. 2:22-cv-293). I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of a Netlist produced document Bates numbered NETLIST_SAMSUNG_EDTX000037749-67.

3. Attached as **Exhibit 2** is a true and correct copy of the Order on Pretrial Motions and Motions *in Limine* in *Netlist v. Samsung*, No. 21-cv-463, Dkt. 432 (E.D. Tex.), dated April 5, 2023.

4. Attached as **Exhibit 3** is a true and correct excerpted copy of Samsung’s Supplemental Objections and Responses to Netlist’s First Set of Interrogatories, dated November 20, 2023.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the Expert Report of John Halbert, dated November 20, 2023.

6. Attached as **Exhibit 5** is a true and correct excerpted copy of the transcript of the Pretrial Conference held in *Netlist v. Samsung*, No. 21-cv-463, Dkt. 427 (E.D. Tex.) on March 29, 2023.

7. Attached as **Exhibit 6** is a true and correct copy of the Order on Motions *in Limine* in *Netlist v. Micron*, No. 22-cv-263, Dkt. 413 (E.D. Tex.), signed on December 27, 2023.

8. Attached as **Exhibit 7** is a true and correct excerpted copy of the deposition transcript of You Keun Han, dated November 9, 2023.

9. Attached as **Exhibit 8** is a true and correct excerpted copy of the deposition transcript of Joseph Calandra, dated November 8, 2023.

10. Attached as **Exhibit 9** is a true and correct excerpted copy of the deposition transcript

of Sung Joo Park, dated November 15, 2023.

11. Attached as **Exhibit 10** is a true and correct excerpted copy of Netlist's First Set of Rule 30(b)(6) Notice of Deposition on Defendants Samsung, dated October, 19, 2023.

12. Attached as **Exhibit 11** is a true and correct excerpted copy of JEDEC Manual of Organization and Procedure, dated September 2020.

13. Attached as **Exhibit 12** is a true and correct excerpted copy of Netlist's Fourth Supplemental Responses and Objections to Samsung's Second Set of Interrogatories, dated November 19, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 20, 2024.

By /s/ Jason G. Sheasby
Jason G. Sheasby